



May 17, 2002

VIA ELECTRONIC FILING

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Suite TW-A325
Washington, D.C. 20554

Re: In re *UNE Triennial Review*, CC Dockets 01-338, 96-98 and 98-147

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's rules, the Competitive Telecommunications Association ("CompTel") hereby gives notice that on May 15, 2002, its representatives and representatives of its member companies Access Integrated Networks, El Paso Global Networks, IP Communications, Illuminet, ITC^Deltacom, Talk America and Z-Tel Communications met with Commissioner Abernathy and Matthew Brill, Legal Advisor to Commissioner Abernathy in the above captioned proceeding.¹ CompTel and its members explained the critical need for the Commission to maintain, at a minimum, the FCC's current list of UNEs. Specifically, CompTel explained the continued need for the availability of unbundled local switching as a UNE, because without such access competitors will be impaired in their ability to serve mass market customers. CompTel also explained the need for the Commission to preserve competitors' access to the ILEC dark fiber UNE. Only through the availability of dark fiber as a UNE, can competitive wholesale carriers bring additional local transport and loop capacity on the market in competition with the RBOC. Such a UNE benefits all competitive carriers, who are dependent on ILEC facilities for transport and last mile connectivity.

¹ See *In the Matter of Review of Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, CC Docket No. 01-338, Notice of Proposed Rulemaking, FCC 01-361 (rel. December 20, 2001) (NPRM).

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Representing Access Integrated Networks was Rodney Page. Representing El Paso Global Networks were Bruce Northcutt, Steve Crawford, and Pete Manias. Representing Illuminet was Jerry Easom. Representing IP Communications was Sean Minter. Representing ITC^DeltaCom was Andrew Walker. Representing Talk America was Gabe Battista. Representing Z-Tel Communications were Robert Curtis and Thomas Koutsky. Representing CompTel in the meeting were Robert McDowell, and the undersigned attorney. Additionally, copies of the attached information about ITC^DeltaCom were distributed and briefly discussed.

Sincerely,

A handwritten signature in cursive script, reading "Jonathan D. Lee".

Jonathan D. Lee

Vice President, Regulatory Affairs

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Consistent with the Commission's rules, copies of this letter and enclosure are provided for inclusion in the public record of each of the above-referenced dockets.

Respectfully submitted,

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Jonathan Lee
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Attachment

cc (via electronic mail): Michelle Carey
 Jeremy Miller
 Thomas Navin
 Robert Tanner

ITC^DeltaCom, Inc. Company Profile

2001 Revenues: \$414M (\$460-470M forecast for 2002)

2001 ebitda: \$ 45M (\$70M forecast for 2002)

Business Profile: Southern-based CLEC (BellSouth overlay)

Telecom Assets Deployed: \$900M

Fiber-optic network \$500M

Voice/Data switching: \$400M

Key Business Metrics:

10,000 route mile fiber network

3,000 miles Internet backbone with 4-way diversity to Tier1

125 points-of-presence

178 ILEC collocations

60 intra-lata routes

36 branch sales/service offices

148 voice, data and next generation switches

Interconnection agreements with BellSouth, Verizon, Sprint & SBC

Bundled Product Offering: Local, LD, frame/ATM, Internet, CPE

Local Switching Strategy: Hub & Spoke (primary to 2nd & 3rd tier mkts)

16,000 Customers @ \$1300/mo average

Retail Lines Installed: 150,000 (does not include 140,000 ISP lines)

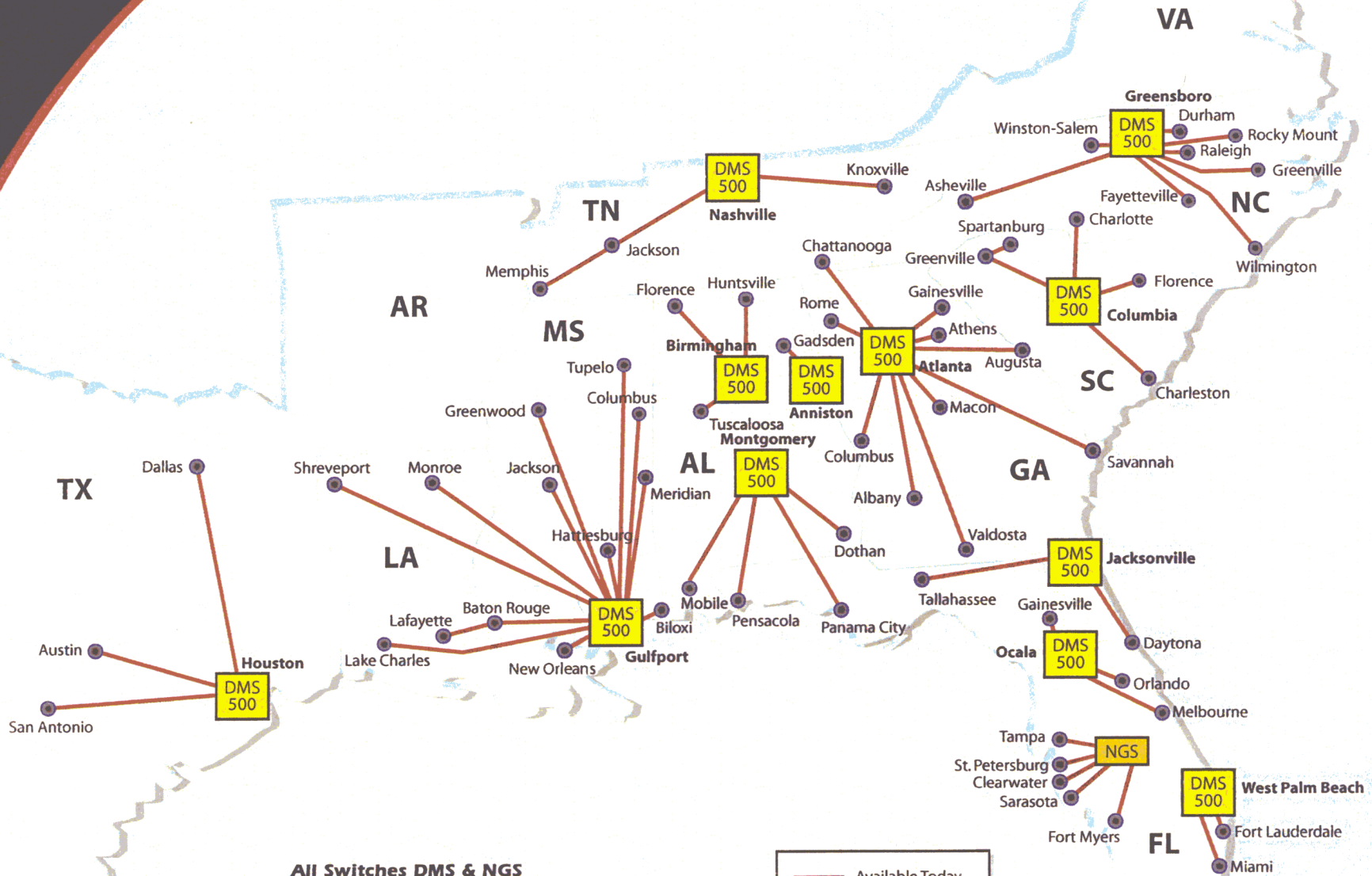
Local Serving Strategy: ILEC last mile

2-7 line customers: UNE-P, UNE, TSR

8+ line customers: UNE-T, DS-3, fiber

Last Mile Alternatives to ILEC: virtually none

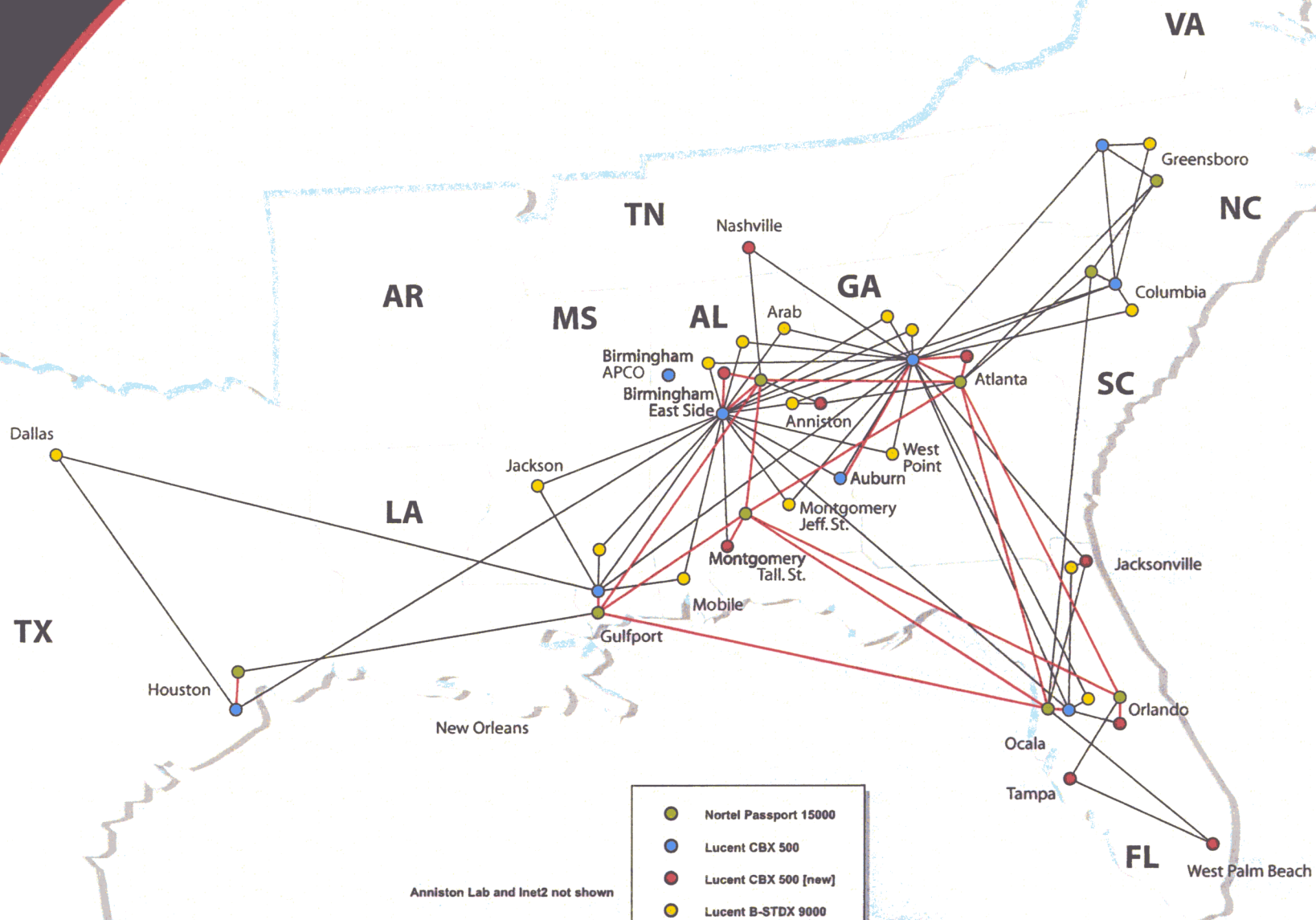




All Switches DMS & NGS
Additional Cities Available.
Consult with your Carrier Account
Manager about SOMET Ring protected routes.

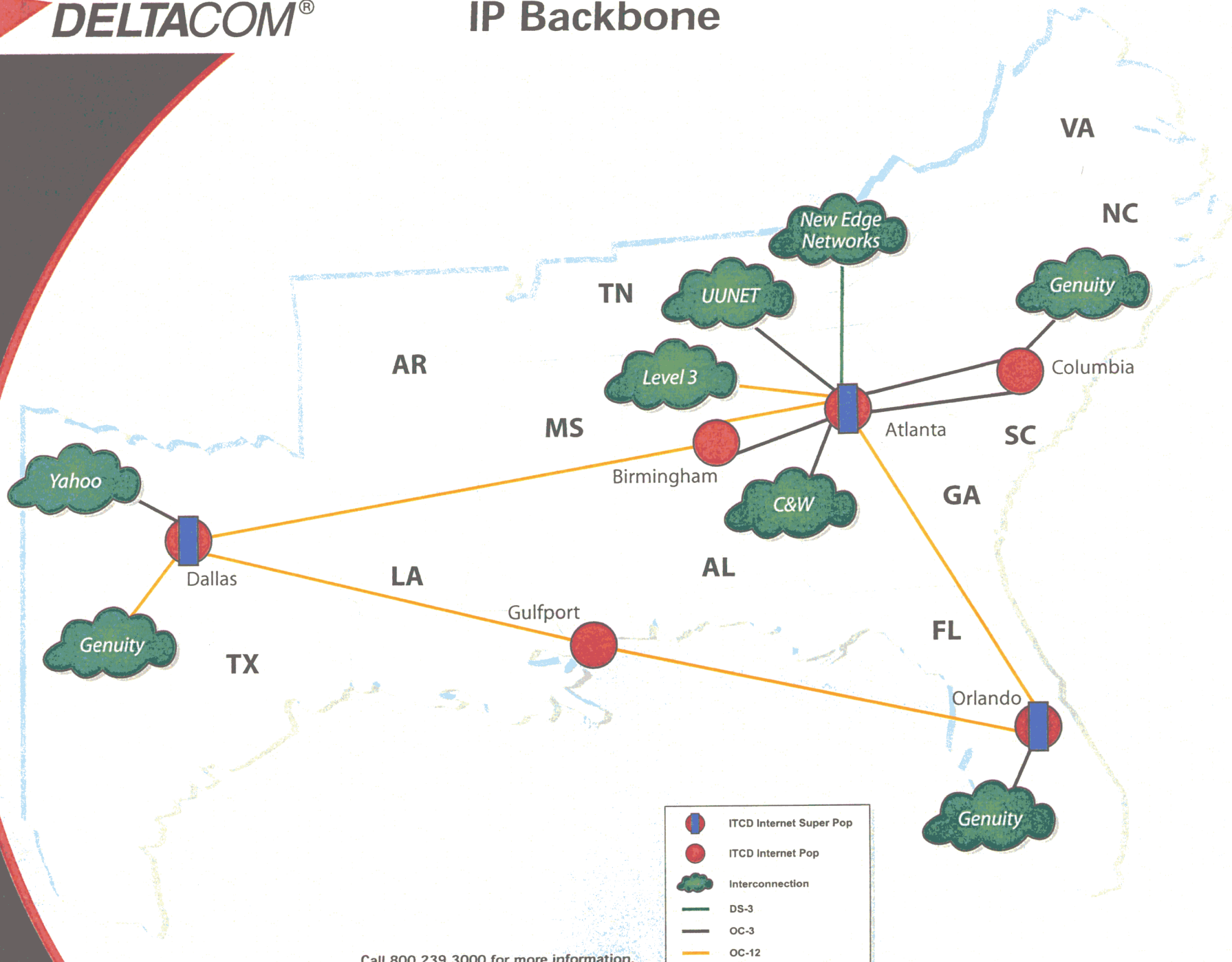
800.239.3000

ITC DELTACOM Frame Relay / ATM Network



Anniston Lab and Inet2 not shown

1-800-239-3000
www.itcdeltacom.com



Call 800.239.3000 for more information.